



Order Filed on October 28, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)
McGovern Legal Services, LLC
By: William H. Brosha, Esq.
850 Carolier Lane
North Brunswick, NJ 08902
(732) 246-1221
Attorneys for Renaissance Walk Condominium
Association, Inc.

In Re:

VICTOR SOOHOO,

Case No.: 19-32992

Judge: Michael B. Kaplan

Chapter: 13

CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF

The relief set forth on the following pages, numbered one (1) through four (4) is hereby **ORDERED**.

DATED: October 28, 2020


Honorable Michael B. Kaplan
United States Bankruptcy Judge

McGOVERN LEGAL SERVICES, LLC
BY: WILLIAM H. BROSHA, ESQ.
850 CAROLIER LANE
NORTH BRUNSWICK, NEW JERSEY 08902
(732) 246-1221

ATTORNEYS FOR RENAISSANCE WALK CONDOMINIUM ASSOCIATION, INC.

In re:

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
IN PROCEEDINGS UNDER CHAPTER 13
OF THE BANKRUPTCY CODE

VICTOR SOOHOO,

CASE NO.: 19-32992 MBK

Debtor.

CONSENT ORDER

CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF

THIS MATTER having been brought before the court by McGovern Legal Services, LLC, attorneys for creditor, Renaissance Walk Condominium Association, Inc. (the "Association"), by way of a Motion for Stay Relief and the parties having consented to the relief set forth herein, and for good cause shown and no cause to the contrary appearing;

IT IS ORDERED, ADJUDGED AND DECREED THAT the Debtor is indebted to the Association in the amount of \$2,902.50 in post-petition maintenance fees and attorneys' fees related to the Association's attempts to collect unpaid post-petition fees through August 11, 2020 (the "Total Due"). The Total Due is detailed below:

Maintenance Fees:	\$2,056.00
Late Fees:	\$50.00
<u>Legal (work related to post-petition default):</u>	<u>\$796.50</u>
Total:	\$2,902.50

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT the Association shall receive payment of the Total Due in six (6) equal consecutive monthly payments in the sum of \$483.75 each, commencing on November 1, 2020, and ending on April 1, 2021.

IT IS FURTHER ORDERED, ADJUDGED and DECREED THAT the Debtor shall maintain his post-petition assessments and other post-petition obligations as they become due and owing to the Association commencing on August 12, 2020; and

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT if the Association fails to timely receive the Total Due or any regular monthly payment within thirty (30) days of the date the payment is due, then the Association may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtor's failure to comply with this Order. At the time the Certification is filed with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtor, and the Debtor's attorney.

**WE HEREBY CONSENT TO THE FORM
AND ENTRY OF THIS CONSENT ORDER:**

McGovern Legal Services, LLC
Attorneys for Renaissance Walk Condominium Association, Inc.

/s/ William H. Brosha
WILLIAM H. BROSHA, ESQ.

10/19/20
DATE

Brenner, Spiller & Archer
Attorneys for Victor Soohoo

/s/ Andrew T. Archer
ANDREW T. ARCHER, ESQ.

DATE

In re:
Victor Soohoo
Debtor(s)

Case No. 19-32992-MBK
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-3
Date Rcvd: Oct 28, 2020

User: admin
Form ID: pdf903

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 30, 2020:

Recip ID	Recipient Name and Address
db	+ Victor Soohoo, 145 Salem Road, North Brunswick, NJ 08902-4557

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 30, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 28, 2020 at the address(es) listed below:

Name	Email Address
Albert Russo	docs@russotrustee.com
Andrew Thomas Archer	on behalf of Debtor Victor Soohoo aarcher@spillerarcherlaw.com bankruptcy@brennerlawoffice.com;mcdoherty_187750@ecf.courtdrive.com;R64966@notify.bestcase.com
Denise E. Carlon	on behalf of Creditor SPECIALIZED LOAN SERVICING LLC dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Denise E. Carlon	on behalf of Loss Mitigation Specialized Loan Servicing LLC dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Matthew J. Goss	on behalf of Creditor Renaissance Walk Condominium Association Inc. collections@theassociationlawyers.com
U.S. Trustee	

District/off: 0312-3

User: admin

Page 2 of 2

Date Rcvd: Oct 28, 2020

Form ID: pdf903

Total Noticed: 1

USTPRegion03.NE.ECF@usdoj.gov

William H Brosha

on behalf of Creditor Renaissance Walk Condominium Association Inc. collections@theassociationlawyers.com

TOTAL: 7